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March 27, 2020

VIA ECF

Hon. Stewart D. Aaron
United States District Court
Southern District of New York
500 Pearl Street, Room 1970
New York, NY 10007

Application GRANTED. The deadline for the completion of discovery is extended until June 1, 2020. Nonetheless, Defendants are encouraged to consider taking Plaintiff's deposition by remote means. Accordingly, it is hereby Ordered, pursuant to Rules 30(b)(3) and 30(b)(4) of the Federal Rules of Civil Procedure, that all depositions in this action may be taken via telephone, videoconference, or other remote means. It is further Ordered, pursuant to Rule 30(b)(5), that a deposition will be deemed to have taken place "before an officer appointed or designated under Rule 28" if such officer attends the deposition using the same remote means used to connect all other participants, so long as all participants (including the officer) can clearly hear and be heard by all other participants. SO ORDERED.

Dated: March 30, 2020

Re: *Jamiel v. Maison Kayser@usa.com et al.*, Case No. 19-cv-1389 (GBD) (SDA)
Meet-and-Confer Status Update and Request to Adjourn Jamiel Deposition

Dear Judge Aaron:

We represent Defendants in the above-referenced matter. In accordance with Your Honor's March 9, 2020 Order, *see* Docket No. 88, we write to provide an update on the parties' meet-and-confer conference related to Mr. Jamiel's deposition, which was previously set to occur in the Southern District's Manhattan courthouse for security reasons.

Defendants reached out to Mr. Jamiel via e-mail (as is his preferred method of contact) to discuss rescheduling his deposition. In response, Mr. Jamiel informed Defendants that he would not be available within the coming two weeks. Defendants proposed that the deposition tentatively be scheduled for April 23, 2020 in the Southern District's Manhattan courthouse—assuming the Southern District resumes normal operations before this time; however, Mr. Jamiel did not respond to this proposal as of the time this letter was filed.

Accordingly, Defendants respectfully request an adjournment of Mr. Jamiel's deposition, until normal operations within the Southern District resume. This is Defendants' second request to adjourn Plaintiff's deposition. Both requests relate to the current COVID-19 pandemic. The Court granted Defendants' first request.

We thank the Court for its time in addressing this matter.

Respectfully submitted,

Christine L. Hogan

cc: Akeel Abdul Jamiel, Pro Se Plaintiff (by email – certificate of service below)